

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

.....
In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

)
) Case No. 13-53846
)
) In Proceedings Under
) Chapter 9
)
) Hon. Steven W. Rhodes
)
.....

**OAKLAND COUNTY’S STATEMENT PURSUANT TO COURT’S ORDER
REGARDING IDENTIFYING LEGAL ISSUES RELATING TO CONFIRMATION**

Oakland County, Michigan (“Oakland County”), a contingent creditor and party in interest in the above-captioned case, by and through its undersigned counsel, hereby files its statement pursuant to the Court’s May 23, 2014 *Order Regarding Identifying Legal Issues Relating To Confirmation* [Docket No. 5021].

Oakland County believes that many of the objections it raised in connection with confirmation of the City’s proposed plan of adjustment present mixed questions of law and fact that cannot be determined without the necessity of proof at the confirmation hearing. In this regard, Oakland County has served the City and others with written discovery and deposition notices (both of which remain on-going) and plans to call both fact and expert witnesses at the hearing on confirmation.

Oakland County further believes that it may be possible to determine the following issues of law relating to confirmation without the necessity of proof at the confirmation hearing –

- a. Whether the City's proposed plan of adjustment contains impermissible third party releases.
- b. Whether the granting of the DWSD CVR's violates applicable law.

Respectfully Submitted,

Dated: May 27, 2014

CARSON FISCHER, P.L.C.

By: /s/ Joseph M. Fischer

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CERTIFICATE OF SERVICE

I, Joseph M. Fischer, hereby certify that the foregoing OAKLAND COUNTY'S STATEMENT PURSUANT TO COURT'S ORDER REGARDING IDENTIFYING LEGAL ISSUES RELATING TO CONFIRMATION was filed and served via the Court's electronic case filing and noticing system on this 27th day of May, 2014.

/s/ Joseph M. Fischer
Joseph M. Fischer (P13452)